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4P STORE

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JUAN/JUANA DOES 1-377,

Civ. No. 1:07-cv-10300-HB

Plaintiffs,

- against -

CHIQUITA BRANDS INTERNATIONAL, INC., INDIVIDUALS "A THROUGH J," MOE CORPORATIONS 1-5, and MOES 6-25,

Defendants,

STIPULATION

USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 110

WHEREAS, plaintiffs commenced this action on November 14, 2007; and WHEREAS, on November 26, 2007, defendant Chiquita Brands International, Inc. ("Chiquita") filed a motion before the Judicial Panel on Multidistrict Litigation, pursuant to 28 U.S.C. § 1407, to centralize this and five other related actions in the United States District Court for the District of Columbia for coordinated or consolidated pretrial proceedings (the "MDL Motion");

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned attorneys for the respective parties that Chiquita shall answer, move against, or otherwise respond to plaintiffs' complaint no later than thirty (30) days after the MDL Motion is decided,

The MDL Motion is decided with the MDL Motion is decided with

Dated: December 7, 2007

LAW-RIRM OF JONATHAN C. REITER

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SO ORDERE

UNITED STATES DISTRICT JUDGE

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but will contact Chambers no later than January 24,2 007 with a status report regardless of whether the MDL motion has been resolved.